

**From:** [Lucas Sun](#)  
**To:** [Patrick Hughes](#)  
**Cc:** [Mark V. Ferrante](#); [Becki Krupiak-Maly](#); [Stacey O'Shea](#); [Andrew Hunt](#); [waimonette@clausen.com](mailto:waimonette@clausen.com); [Raymond Mack](#)  
**Subject:** Re: Est of Janega vs. Electrolux, et. al.; 2021 L 6319 - Transforms" Overdue Discovery Responses  
**Date:** Monday, February 6, 2023 11:42:50 AM  
**Attachments:** [image001.png](#)  
[Outlook-2iak4lmg.png](#)

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Hi Patrick

My client is still working on the requests, as you know the successor liability discovery is asking detailed information regarding the financials of Transform and my client is still in the process of determining the relevant production/information within its control (as opposed to Sears).

It may take longer than the additional 15 days, but I will press my client on these. I appreciate your patience and will keep you all posted.

Lucas Sun  
**PARTNER**  
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**From:** Patrick Hughes <[phughes@delucalevine.com](mailto:phughes@delucalevine.com)>  
**Sent:** Monday, February 6, 2023 7:14 AM  
**To:** Lucas Sun <[LSun@ohaganmeyer.com](mailto:LSun@ohaganmeyer.com)>  
**Cc:** Mark V. Ferrante <[mvf@ferrantelaw.com](mailto:mvf@ferrantelaw.com)>; Becki Krupiak-Maly <[rkrupiakmaly@delucalevine.com](mailto:rkrupiakmaly@delucalevine.com)>; Stacey O'Shea <[soshea@delucalevine.com](mailto:soshea@delucalevine.com)>; Andrew Hunt <[AHunt@delucalevine.com](mailto:AHunt@delucalevine.com)>; [waimonette@clausen.com](mailto:waimonette@clausen.com) <[waimonette@clausen.com](mailto:waimonette@clausen.com)>; Raymond Mack <[rmack@delucalevine.com](mailto:rmack@delucalevine.com)>  
**Subject:** [EXTERNAL] Est of Janega vs. Electrolux, et. al.; 2021 L 6319 - Transforms' Overdue Discovery Responses

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Lucas,

Plaintiffs have not received responses from Transform SR Brands LLC or Transform Holdco LLC to:

- Plaintiffs' First Set of Interrogatories and Request for Production of Documents (due 12/1/22); or
- Plaintiffs' Second Set of Interrogatories and Request for Production of Documents (due

on 12/1/22).

Kindly provide responses within fifteen (15) days to avoid court intervention.

### **Patrick Hughes**

Member

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